

ENVIRON

186844



May 14, 1999

Federal Express

U.S. Environmental Protection Agency
2890 Woodbridge Avenue
Bldg. 209 (MS-211)
Edison, New Jersey 08837
Attention: Cornell-Dubilier Electronics Site On-Scene Coordinator

Chief, New Jersey Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency
290 Broadway, 17th Floor
New York, New York 10007-1866
Attention: Cornell-Dubilier Electronics Site Attorney

Re: Cornell-Dubilier Electronics Site - Administrative Order on Consent for Removal
Action, Index No. II-CERCLA-98-0115
Progress Report No. 19

Dear Sirs:

As specified in Paragraph 50 of the above-referenced Administrative Order, on behalf of Respondent Cornell Dubilier Electronics, Inc. (CDE), ENVIRON Corporation (ENVIRON) is submitting this progress report which summarizes activities conducted pursuant to this AOC between April 22, 1999 and May 5, 1999.

Completed Activities

During this period, the following activities were completed:

- Discussions with USEPA regarding restoration issues identified by the owner of Property N regarding changes to landscape restoration plans.
- Laboratory analysis of a composite topsoil sample from KLK Trucking. These draft data were provided to USEPA on April 28, 1999.
- Approval to use KLK Trucking topsoil. This approval was verbally received from USEPA on April 29, 1999.

Ongoing Activities

During this period, the following activities were initiated and/or are in-progress:

- Implementation of restoration activities at the six properties.

May 14, 1999

- Validation of final verification data and TSCA delineation data obtained from samples collected on March 5, March 30 and April 6, 1999.

Two-Week Schedule of Planned Activities

During the next two-week period (May 6, 1999 through May 19, 1999) the following activities are planned:

- Completion of data validation for all verification samples.
- Preparation of the final removal action report.

One-Month Schedule of Planned Field Activities

During the next four-week period (May 6, 1999 through June 2, 1999), the following field activities are planned:

- Completion of restoration activities.
- Reinstallation of the pool located on Property F.
- Contractor demobilization activities.

Please call me or Mark Nielsen at (609) 452-9000 if you should have any questions regarding this progress report.

Sincerely,



Michael P. Scott
Principal

MPS:jmn
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cc: R. Sanoff, Esq.

Tier 1

3/17

Received call from
Pat Austin START
regarding restorations at
210 Spicer Paver Res.
501 Garibaldi Kane Res.

- 1) Sod has died at 210
Spicer. Resident says
sod sat out on the Pallet
for several days before
installation. Pat Austin
says the sod was wet
this morning.
- 2) Resident at 501 Garibaldi
is unhappy with restorations
at her property. Sod is
lumpy and uneven.

Over
Gina Reynolds of Environ was
present and heard complaints and
has forwarded them to her office

4/29

Conv w/ Mark Nelsen, Environ
re T1 soil removal

- 1) Analysis supplied for KKK
truck topsoil meets
HIDEP proposed cleanup standards
- 2) Asked M. Nelsen to check to
see if Mrs. Reidy
had been reimbursed for
expenses incurred during temporary
relocation.
- 3) Restorations @ 501 H
a) siding will be repaired
b) will reevaluate dogwood
in spring 2000
c) notified MN that ~~residents~~ regudy
claim that fence bordering 501 H

4/26

Spoke w/ M. Nielsen
regarding concrete repairs

- Nielsen said ITS
will ~~erak~~ remove broken
concrete sidewalk and
~~repa~~ ^{replaced} pour new panels

- M. Nielsen said ~~they~~ that
ITS ~~has~~ plans on ^{@201. Spicor}
removing broken panel of patio
and replace it in kind.
This has been discussed
with and agreed to by
homeowner M. Reidy

4/23

Spoke w/ Mark Nielsen
of Environs re Tier 1

- 1) Request for reimbursement of relocation expenses has been put through to CDE for payment, he expects payment in a couple of days.
- 2) ITS and Riccardi have worked out differences on restoration of parking areas
- 3) Topsoil application is planned ~~for~~ to begin 4/26 and last ~ 1 week
- 4) Jim Conroy, landscaper for M. Reidy has been informed of schedule. ITS will place topsoil



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
EDISON, NEW JERSEY 08837

By Facsimile and U.S. Mail

April 16, 1999

Mr. Michael Scott
ENVIRON
214 Carnegie Center
Princeton, NJ 08540-6284

Re: Administrative Order on Consent for Removal Action at the Cornell-Dubilier Electronics Site, Index Number II-CERCLA-98-0115
Work Plan Addendum

Dear Mr. Scott:

The procedures specified in the Proposed Addendum Revised Residential Property Removal Action Work Plan dated April 16, 1999 were discussed with Mark Nielsen on April 7, 1999 and approved by EPA.

The procedures specified in the addendum were not applied consistently during the loading and unloading of soils from this area. It was necessary to remind the remediation contractor repeatedly to inspect and clean the tires of trucks leaving the stockpile area. Unloading soils from this area is expected to be completed today. If areas within the Hamilton Industrial Park are to be used to support future removal activities, additional controls will be necessary to minimize tracking of soils. I discussed this issue with Mark Nielsen on April 16, 1999. If you would like to discuss this issue further, please call me at (732) 906-6991.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Wilson".

Eric Wilson
On-Scene Coordinator

cc: M. Sundram, EPA

Post-it® Fax Note 7671

Date 4/16/99 # of pages 1

To <i>ERIC WILSON</i>	From <i>MARK NIELSEN</i>
Co./Dept.	Co.
Phone #	Phone #
Fax #	Fax #



**62 Bog and Vly Lane
Lincoln Park, New Jersey 07038**

Office: (973) 427-3030
Fax: (973) 427-4040

Integrated Technical Services
P.O. Box 156
Winslow, N.J. 08095
Mr. Dave Wilder.

4/1/99

RE: Topsoil at the Anthony Bakery Site, Denville, N.J.

Dear Mr. Wilder:

In reference to the soil sample which we have forwarded to you, this site is known to be a virgin site. It is located on the Township of Denville, Morris County, Linger Road, Lot 4 Block 31601. To the best of our knowledge, this topsoil contains no contaminants. If you need further information please call me.

Sincerely,


Peter J. Caruso Jr.



ENVIRON

April 16, 1999

Facsimile

Mr. Eric Wilson
Cornell-Dubilier Electronics Site On-Scene Coordinator
U.S. Environmental Protection Agency
2890 Woodbridge Avenue
Bldg. 209 (MS-211)
Edison, New Jersey 08837

Re: Cornell-Dubilier Electronics Site - Administrative Order on Consent for Removal
Action, Index No. II-CERCLA-98-0115
Work Plan Addendum & Notification of Restoration Schedule Delay

Dear Mr. Wilson:

As you discussed with Mark Nielsen of ENVIRON on April 7, 1999, on behalf of Respondent Cornell Dubilier Electronics, Inc. (CDE), ENVIRON is providing this addendum to the approved *Revised Residential Property Removal Action Work Plan, South Plainfield, New Jersey* (Work Plan) to clarify the plan for managing and restoring the soil stockpile area on the Hamilton Industrial Park Site. This addendum is attached for your review.

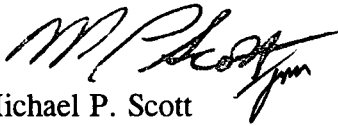
In addition, as Mr. Nielsen indicated to you on April 13, 1999, removal action activities will be substantially completed by April 16, 1999. Specifically, it is anticipated that all soil excavation and disposal activities, and backfilling of excavations to within 6-inches of final grade will be completed. However, as a result of USEPA's additional specifications for determining the acceptability of a topsoil source, which were not communicated to ENVIRON until March 30, 1999, restoration activities will be delayed until a topsoil source acceptable to USEPA can be identified. As these additional requirements for topsoil approval were not part of the approved Work Plan, and were received after CDE's remediation contractor had already identified a local source for topsoil, the schedule for restoration activities will be delayed beyond the AOC-specified 120-day completion date.

At this time, the remediation contractor's topsoil supplier has informed the contractor that they do not want to complete the analytical work necessary to meet USEPA's requirements for approval. Therefore, the remediation contractor has identified three alternative sources to be evaluated according to USEPA's additional specifications for use on this project. Sampling of these sources was initiated on April 14, 1999, and draft results from this

sampling are expected from the laboratory by April 20, 1999. I have also attached a copy of a source identification letter for one of these possible sources; I believe that the information provided in this letter meets USEPA's requirements in lieu of sampling data. Given the current status of these activities, we anticipate that a viable source can be identified to USEPA by April 21, 1999. Once approval of a topsoil source is received from USEPA, we will plan to provide an updated schedule for completion of the restoration activities in accordance with the Work Plan.

Please call me or Mark Nielsen at (609) 452-9000 if you should have any questions regarding the information provided above.

Sincerely,



Michael P. Scott
Principal

MPS:pas

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cc: R. Sanoff, Esq., Foley, Hoag & Eliot
M. Sundram, USEPA

**PROPOSED ADDENDUM TO THE
Revised Residential Property Removal Action Work Plan,
South Plainfield, New Jersey**

April 16, 1999

Section 5.5.4 Staging and Storage Area

Section 5.5.4 of the approved *Revised Residential Property Removal Action Work Plan, South Plainfield, New Jersey* (Work Plan) specifies that in the event that direct loading of excavated soils cannot occur, the soil will be temporarily staged on the Hamilton Industrial Park site. Excavated soils are to be placed on a plastic liner and surrounded with a silt fence, and if not removed by the end of a work day the stockpile is to be covered with a plastic tarp.

In addition to the set-up requirements identified above for this soil stockpile area, the following operational requirements will be implemented during the loading and unloading of soils in this area:

1. A gravel access road leading from the site boundary to the stockpile area will be maintained to reduce the contact between trucks entering and exiting this area with the native soils.
2. Truck tires will be inspected for accumulated soil when exiting this area and any accumulated soil will be removed (by dry brushing or water spray) to minimize tracking of soil outside the area.
3. In the event that soil erosion from the stockpile and surrounding work area is identified, then an additional erosion control fence will be installed at the perimeter of the contractor's staging/storage area (see Figure 5-1 of the Work Plan).

On completion of the project, the plastic liner and silt fence will be removed. In addition, the contractor's staging/storage area, which includes the stockpile area, will be seeded to restore a vegetative cover to the disturbed area, and the Hamilton Industrial Park fencing will be restored to pre-construction condition.



**62 Bog and Vly Lane
Lincoln Park, New Jersey 07035**

Office: (973) 427-3030
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Integrated Technical Services
P.O. Box 156
Winslow, N.J. 08095
Mr. Dave Wilder.

4/1/99

RE: Topsoil at the Anthony Bakery Site, Denville, N.J.

Dear Mr. Wilder;

In reference to the soil sample which we have forwarded to you, this site is known to be a virgin site. It is located on the Township of Denville, Morris County, Luger Road, Lot 4 Block 31601. To the best of our knowledge, this topsoil contains no contaminants. If you need further information please call me.

Sincerely,

A stylized, handwritten signature in black ink, appearing to read "Peter J. Caruso Jr.", is written over the word "Sincerely,".

Peter J. Caruso Jr.

3/23

Spoke w/ Robert Reimo Environmental Evaluation Group regarding excavation of soil in proximity to mature trees at Cornell-Dubiler Tree residents. Asked if mature trees would survive shallow excavation (6") around base. He said it would depend on tree species (ie oaks which are deep rooted would have a good chance). Asked if trees ^{in question} properly C ~~would~~ namely red maple, Japanese maple and blue spruce would likely survive. R. Reimo indicated that all were notoriously shallow rooted and survival ~~is~~ is questionable. He recommended that if ~~a~~ attempted trees

should be radically pruned
by a tree expert prior
to excavation. This would reduce
leaf area and transpiration.

Asked how long it would
take to determine if
trees ~~had~~ survived, would
survive. R. Rains indicated
that 2 years would be
sufficient to determine if
trees would survive.

Actions

- ~~recommended~~ ^{required} radical pruning
- revisit after 2 years
to reevaluate health of
trees.

3/25/99

Conversation w/ Mark
Nelson ~~info~~ ENVIRON

1) informed him that certificate
provided for topsoil was
not sufficient. Source was
not identified.

2) informed Mark that if
they wanted to attempt to
~~save trees~~ leave tree
within excavation areas
they would have to

a) radically prune prior
to excavation
b) revisit after 2 years
to evaluate survival of
trees

3/20

Spoke w/ Mark Nielsen
Environ regarding topsoil.

Letter and analysis provided
by KLC Trucking is not
sufficient

Soil should be free from contaminants & support vegetation

Letter needs to document
source that soil is from
virgin source (non-industrial
non commercial) or provide
analysis showing is free
from contaminants (TCL
List).

Would compare ~~test~~ analysis
to NJDEP proposed cleanup
standards.

MN made argument that because this
material is offered in commerce ~~it~~
that should be sufficient & that EPA is

~~being~~ adding additional constraints.

4/2

Conv. w/ Mark Nielsen, Environ

- 1) Approved of revised study plan (TZ)
- 2) Passed along message from M. Reidy regarding reimbursement for meals and incidentals. M Nielsen will see that she is reimbursed
- 3) Informed MN of conv. w/ tenants of 801 Hamilton. They are now comfortable w/ activities
- 4) Bulbs at 801 Hamilton need to be replaced
- 5) MN informed we that topsoil source has been sampled

4/7

Spoke w/ M. Nielsen of
Environ regarding loadout
from ~~large~~ area. Expressed
concern regarding the potential
for contaminant migration
from this area.

M. Nielsen responded that he
had instructed the remediation
contractor to apply ~~an~~ additional
~~stone~~ ~~where~~ to the path
trucks travel and ~~have~~
check wheels as they leave
the area.

Asked that the workplan be
amended to reflect actual
procedures.

4/13

Conversation w/ Mark Nielsen
Environ regarding T1 Soil
Removal

- 1) Environ and Mr. Riccardi, owner 305 Spicer have ~~worked~~ ~~out details~~ reached an agreement regarding restoration
 - fence will be moved,
 - larger area will be ~~used~~ ~~for covered~~ with stone.
- 2) Informed MN ~~tho~~ of Mr. Chaviraggi's request for reimbursement for cost of ~~replacement~~ of shrubs.
in lieu of replacement
- 3) Topsoil provider, that ~~was~~ ~~sampled~~ analyzed soil, ~~is no~~ ~~can~~ cannot meet documentation requirements. Environ/ITC are investigating 3 alternate suppliers (1 virgin soil, K&K Truck

and one attached). If soil is from other than virgin source soil will be provided to Environ for analysis. MN will ~~not~~ provide a schedule tomorrow for resolution of topsoil issue, letter being prepared.

- 4) Letter documenting changes in procedures employed for locant ~~is in the way~~ will be provided in 1 to 2 days
- 5) ~~Informed MN that T2~~

4/14

Received call from Mark
Nielsen regarding tier 1
soil removal.

Several topsoil sources have
been identified. 1 source
18 virgin 2 MN will
send a letter (indicated
that documentation was sufficient).
Samples have been received
from 2 (or more) additional
sources. The samples will
be sent to Quanta by
72 hr turnaround. A topsoil
provider will be chosen
next.